

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

VEHICLE INTERFACE TECHNOLOGIES, LLC,)
Plaintiff,) C.A. No. _____
v.)
JAGUAR LAND ROVER NORTH AMERICA, LLC,)
Defendant.) JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

This is an action for patent infringement in which Plaintiff Vehicle Interface Technologies, LLC (“VIT”) makes the following allegations against Defendant Jaguar Land Rover North America, LLC (“Defendant”):

PARTIES

1. Vehicle Interface Technologies, LLC is a Delaware limited liability company.
2. On information and belief, Defendant is a Delaware corporation with its principal office at 555 MacArthur Boulevard, Mahwah, New Jersey 07430. Defendant has appointed The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801, as its agent for service of process.

JURISDICTION AND VENUE

3. This action arises under the patent laws of the United States, 35 U.S.C. § 1, *et seq.*, including § 271. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

4. This Court has personal jurisdiction over Defendant because, among other reasons, Defendant has done business in this District, has committed and continues to commit acts of patent infringement in this District, and has harmed and continues to harm VIT in this

District, by, among other things, using, selling, offering for sale, and importing infringing products and services in this District.

5. Venue is proper in this District under 28 U.S.C. §§ 1331(b)-(d) and 1400(b) because, among other reasons, Defendant is subject to personal jurisdiction in this District, has committed and continues to commit acts of patent infringement in this District. On information and belief, for example, Defendant has used, sold, offered for sale, and imported infringing products in this District.

COUNT I

INFRINGEMENT OF U.S. PATENT NO. 6,842,677

6. VIT is the owner by assignment of United States Patent No. 6,842,677 to Prakash S. Pathare, (the “Pathare Patent”), entitled “Vehicle User Interface System and Method.” The application for the Pathare Patent was filed on February 28, 2003. The patent issued on January 11, 2005. A true and correct copy of the Pathare Patent is attached as Exhibit A.

7. Defendant has been and now is directly infringing the Pathare Patent, in this judicial District and elsewhere in the United States, by, among other things, making, using, importing, offering for sale, and/or selling products and services that include a computing system and a display that includes a fixed area to display vehicle information, e.g., speed, gas level, etc., and a selectable area to display a plurality of pages, each of which include at least one parameter for at least one of the vehicle’s optional subsystems and wherein the fixed and selectable areas each comprise a unique and static portion of the display. The computing system communicates with the display and operates the plurality of optional subsystems based on at least one parameter. In addition, the infringing products and services include one or more input devices in communication with the computing system and located on the vehicle’s steering device and/or the secondary display. The infringing products and services include, for example, Defendant’s Jaguar XJ with virtual instruments and/or integrated controls, and various versions thereof.

8. By engaging in the conduct described herein, Defendant has injured VIT and is thus liable for infringement of the Pathare Patent pursuant to 35 U.S.C. § 271.

9. Defendant has committed these acts of infringement without license or authorization.

10. To the extent that facts learned in discovery show that Defendant's infringement of the Pathare Patent is, or has been willful, VIT reserves the right to request such a finding at the time of trial.

11. As a result of Defendant's infringement of the Pathare Patent, VIT has suffered monetary damages and is entitled to a money judgment in an amount adequate to compensate for Defendant's infringement, but in no event less than a reasonable royalty for the use made of the invention by Defendant, together with interest and costs as fixed by the Court, and VIT will continue to suffer damages in the future unless Defendant's infringing activities are enjoined by this Court.

12. VIT has also suffered and will continue to suffer severe and irreparable harm unless this Court issues a permanent injunction prohibiting Defendant, its agents, servants, employees, representatives, and all others acting in active concert therewith from infringing the Pathare Patent.

PRAYER FOR RELIEF

VIT respectfully requests that this Court enter:

- A. A judgment in favor of VIT that Defendant has infringed, directly and/or indirectly, the Pathare Patent, and that such infringement was willful;
- B. A permanent injunction enjoining Defendant and its officers, directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert therewith from infringement of the Pathare Patent, or such other equitable relief the Court determines is warranted;
- C. A judgment and order requiring Defendant to pay VIT its damages, costs, expenses, and prejudgment and post-judgment interest for Defendant's infringement of the Pathare Patent as provided under 35 U.S.C. § 284;

- D. A judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding to VIT its reasonable attorneys' fees against Defendant;
- E. A judgment and order requiring Defendant to provide an accounting and to pay supplemental damages to VIT, including without limitation, pre-judgment and post-judgment interest; and
- F. Any and all other relief to which VIT may be entitled.

DEMAND FOR JURY TRIAL

VIT, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

Dated: October 5, 2012

FARNAN LLP

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